

EXHIBIT B

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March 6, 2006

VIA E-MAIL and FIRST CLASS MAIL

Amy Brody, Esq.
Rakoczy Molino Mazzochi Siwik LLP
6 West Hubbard Street, Suite 500
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Re: In re: '318 Patent Infringement Litigation; Civil Action No.
05-356-KAJ (consolidated)

Dear Amy:

In light of Plaintiffs' upcoming Rule 30(b)(6) deposition of Mylan on March 15-17, we request that you (a) identify the Mylan designees who will testify and on what subjects, and (b) complete Mylan's document production. In light of the fact that the deposition will occur next week, we request that you do so by no later than Wednesday, March 8.

We call your attention to the following deficiencies we have identified in Mylan's production thus far:

- There appear to be missing meeting minutes, such as, for example, minutes related to the meetings identified in MYLAN(GAL)06698, MYLAN(GAL)06699, MYLAN(GAL)06700, MYLAN(GAL)06701, MYLAN(GAL)06702, MYLAN(GAL)04150. We request that all meeting minutes identified or referred to in these documents be produced immediately.
- Although you have produced organizational charts from 2005 and 2004, it has become clear that Mylan made certain decisions related to its pursuit of producing a generic version of Reminyl® earlier than 2004. Therefore, we request organizational charts dating back to 2000. Also, in light of Mylan's prior contact with Dr. B. Davis, we request an organizational chart from 1986.
- We have not yet received a copy of Mylan's document retention policy. Given the volume of Mylan documents received to date, it is necessary that we understand Mylan's policies and procedures for retaining documents pertaining to

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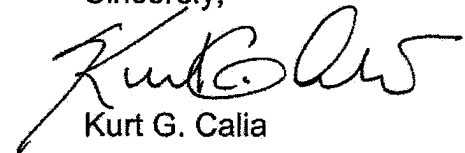
Amy Brody, Esq.
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their development of generic drugs. Please produce copies of Mylan's document retention policies dating back to 2000, and its document retention policy from 1986.

- We have received translations for some of the references produced by Mylan. We request that all such translations in the possession of Mylan (or its counsel) be produced right away.

We request that these deficiencies be corrected immediately. Should Mylan produce documents after next week's R. 30(b)(6) deposition, Plaintiffs will reserve the right to continue the deposition. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Kurt G. Calia

cc: All defense counsel (vial email; see attached service list)
Steven Balick, Esq. (via email)

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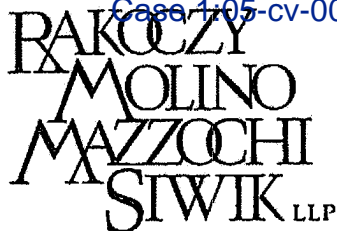
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March 7, 2006

VIA Facsimile and E-mail

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**Re: *In Re: '318 Patent Infringement Litigation*
C.A. No. 05-356 (KAJ) (D. Del.) (consolidated)**

Dear Kurt:

On behalf of Mylan, we write in response to your letter dated March 6, 2006, and Plaintiffs' numerous Rule 30(b)(6) deposition notices (noticed for March 15-17) to Mylan; and to follow up on Mylan's document production.

As an initial matter, Mylan will not be available for deposition on the noticed dates of March 15-17, 2006. We are endeavoring to provide you with possible alternative deposition dates. Please note, however, that Mylan also objects to the multiple deposition notices and the numerous improper topics set forth therein. We will provide Mylan's formal objections separately. But it is clear that many topics will have to be withdrawn and a proper notice re-issued.

With respect to the remainder of your March 6 letter, Mylan disagrees that there are any so-called "deficiencies" in Mylan's production. We address each of your bullets in turn:

- First, there are no missing meeting minutes. Mylan has produced all such responsive, non-privileged minutes in its possession.
- Second, as you acknowledge, Mylan has already produced organizational charts. Mylan has no obligation to produce

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anything further. In the spirit of cooperation, however, Mylan will produce any additional charts in its possession this week.

- Third, Mylan does not have a written "document retention policy" as we understand your use of that term, and, therefore, Mylan has no documents to produce in this regard.
- Fourth, Mylan has produced copies of the translations in its possession.

That said, as you know, Mylan recently produced documents bates numbered, MYLAN(GAL) 04898-06715. With the exception of the additional organizational charts that Mylan will produce this week, this confirms, following reasonable search efforts and investigation by Mylan, the completion of Mylan's final production of non-privileged documents that are responsive to any currently outstanding document requests by Plaintiffs.

More specifically, we address, in the same order, each category of documents Plaintiffs previously alleged was deficient in Mylan's production, upon reasonable search efforts and investigation by Mylan:

Plaintiffs' Request	Mylan's Response
No. 3(d): ". . .documents relating to the decision to file [the ANDA]"	Mylan has produced all responsive, non-privileged documents, including all responsive, non-privileged "Phase I"-related documents.
No. 16: "All documents relating to Mylan's April 27, 2005 Notice of Paragraph IV Certification to [plaintiffs]."	Mylan has produced all responsive, non-privileged documents.
No. 17: "All documents relating to the analysis or evaluation for any purpose of any drug product containing galantamine or any salt thereof, including but not limited to Janssen's RAZADYNE®/REMINYL® products."	Mylan has produced all responsive, non-privileged documents concerning Janssen's RAZADYNE®/REMINYL® products.
No. 20: "All documents relating to the '318 patent, including without limitation (a) any evaluation, analysis, or discussion relating to the '318 patent; (b) any communications between Mylan and any third party concerning the '318 patent."	Mylan has produced all responsive, non-privileged documents.

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<p>Nos. 4 and 10: All documents relating to research and development of "any drug product containing galantamine or any salt thereof . . ." or "any product intended to treat dementia of the Alzheimer's type"</p>	<p>Mylan has produced all responsive, non-privileged documents concerning the galantamine hydrobromide tablets, which are the subject of Mylan's ANDA No. 77-590.</p>
<p>No. 3: "All documents relating to any ANDA (including without limitation Mylan's Abbreviated New Drug Application . . . No. 77-590), and any amendment, supplemental filing, or addition thereto, submitted . . . to the FDA seeking permission to manufacture, market, or sell a drug product containing galantamine"</p>	<p>Mylan has produced all responsive, non-privileged documents concerning Mylan's ANDA No. 77-590.</p>
<p>Nos. 5 and 11: All documents relating to the research, analysis, or evaluation "of a drug product containing galantamine or any salt thereof . . .," and "of a drug product intended to treat dementia of the Alzheimer's type."</p>	<p>Mylan has produced all responsive, non-privileged documents concerning the galantamine hydrobromide tablets, which are the subject of Mylan's ANDA No. 77-590.</p>
<p>Nos. 6 and 12: All documents relating to the market or potential market "for drug products containing galantamine or any salt thereof . . .," and "for drug products intended to treat dementia of the Alzheimer's type."</p>	<p>Mylan has produced all responsive, non-privileged documents concerning Mylan's ANDA No. 77-590.</p>
<p>Nos. 7 and 13: All documents relating to Mylan's decision to make and sell "a drug product containing galantamine or any salt thereof," and "a drug product intended to treat dementia of the Alzheimer's type."</p>	<p>Mylan has produced all responsive, non-privileged documents concerning the galantamine hydrobromide tablets, which are the subject of Mylan's ANDA No. 77-590.</p>
<p>Nos. 8 and 14: All documents that relate to any application filed with any governmental agency or regulatory body, whether foreign or domestic, seeking approval to manufacture, market or test "a drug product containing galantamine or any salt thereof," or "a drug product intended to treat dementia of the Alzheimer's type."</p>	<p>Mylan has produced all responsive, non-privileged documents concerning Mylan's ANDA No. 77-590.</p>

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<p>Nos. 9 and 15: All documents relating to the types of conditions or indications for which physicians may prescribe "a drug product containing galantamine or any salt thereof . . .," and "a drug product approved for the treatment of dementia of the Alzheimer's type"</p>	<p>Mylan has produced all responsive, non-privileged documents concerning Mylan's ANDA No. 77-590.</p>
<p>No. 18: "All documents relating [to] Mylan's contention that Plaintiffs have not accurately characterized or described the labeling of proposed galantamine hydrobromide tablets and REMINYL® and RAZADYNE® tablets."</p>	<p>Mylan has produced all responsive, non-privileged documents.</p>
<p>No. 19: "Documents, including corporate organizational charts and/or handbooks sufficient to show Mylan's management structure from one year prior to the decision to develop and sell a drug product containing galantamine or any salt thereof to the present."</p>	<p>With the exception of the additional organization charts Mylan has agreed to produce (as discussed above), Mylan has produced all responsive, non-privileged documents.</p>
<p>Nos. 21 and 22: All documents relating to any patent application filed by or for Mylan or assigned to Mylan describing or claiming "a drug product containing galantamine or any salt thereof," and "any treatment for dementia of the Alzheimer's type. . . ."</p>	<p>Mylan has no such documents regarding galantamine.</p>
<p>No. 23: "All documents relating to anything that Mylan contends is 'prior art' to the '318 patent."</p>	<p>Mylan has produced all responsive, non-privileged documents.</p>
<p>No. 24: "All documents relating to Mylan's contention that the '318 patent is invalid."</p>	<p>Mylan has produced all responsive, non-privileged documents.</p>
<p>No. 34: "To the extent not otherwise encompassed by other document requests, produce all documents relating to Mylan's affirmative defenses and counterclaims in this case."</p>	<p>Mylan has produced all responsive, non-privileged documents.</p>

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No. 35: "All documents relating to document retention or destruction at Mylan from one year prior to the decision to develop and sell a galantamine hydrobromide product to the present."	Mylan has no documents responsive to this Request.
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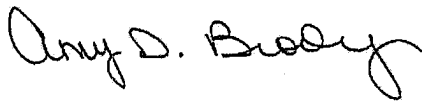
Mylan reserves its right, and fully intends to comply with its duty, to supplement its response to any request for production, should Mylan discover or become aware of any additional responsive documents.

Finally, any documents that Mylan has withheld on the grounds of privilege to date are set forth in the privilege log served by Mylan on February 21, 2006.

If you should have any questions concerning Mylan's document production or any other matter, please do not hesitate to contact us.

Very truly yours,

RAKOCZY MOLINO MAZZOCHI SIWIK LLP



Amy D. Brody

cc: Attached service list

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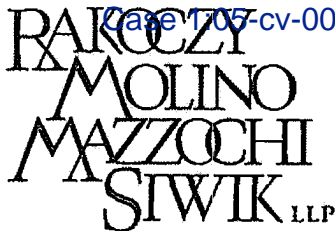
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March 13, 2006

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Re: In Re: '318 Patent Infringement Litigation
C.A. No. 05-356 (KAJ) (D. Del.) (consolidated)

Dear Kurt:

Pursuant to my voicemail this morning, and as a follow-up to my March 7, 2006 letter, we advise that Mylan is not available for a Rule 30(b)(6) deposition on the noticed dates of March 15-17, 2006. We are endeavoring to obtain alternative dates for this deposition from Mylan. Please confirm that Plaintiffs agree to reschedule the Rule 30(b)(6) deposition of Mylan to a date mutually convenient for both Mylan and Plaintiffs. We trust that this will not be a problem in light of the accommodations the Defendants provided in previously agreeing to reschedule the deposition of Bonnie Davis.

If you should have any questions, please do not hesitate to contact us.

Very truly yours,

RAKOCZY MOLINO MAZZOCHI SIWIK LLP

A handwritten signature in cursive script that reads "Amy D. Brody".

Amy D. Brody

cc: Attached service list

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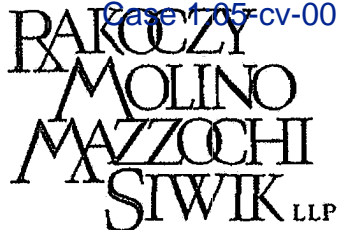
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EXHIBIT E



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March 14, 2006

VIA Facsimile and E-mail

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Re: In Re: '318 Patent Infringement Litigation
C.A. No. 05-356 (KAJ) (D. Del.) (consolidated)

Dear Kurt:

Pursuant to our conversation today, this confirms that the parties agree to re-schedule the Rule 30(b)(6) deposition of Mylan, currently noticed for March 15-17, 2006, for a date mutually convenient for the parties.

If you should have any questions, please do not hesitate to contact us.

Very truly yours,

RAKOCZY MOLINO MAZZOCHI SIWIK LLP

A handwritten signature in cursive script that reads "Amy D. Brody".

Amy D. Brody

cc: Attached service list

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